

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20-_____
v.	:	DATE FILED: _____
GEOFFREY HINES	:	VIOLATIONS:
	:	18 U.S.C. § 2422(b) (use of an interstate
	:	commerce facility to entice a minor to
	:	engage in sexually explicit conduct – 14
	:	counts)
	:	18 U.S.C. § 2251(a), (e) (manufacture and
	:	attempted manufacture of child
	:	pornography – 14 counts)
	:	18 U.S.C. § 2252(a)(4)(B), (b)(2)
	:	(possession of child pornography – 1
	:	count)
	:	Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH FOURTEEN

THE GRAND JURY CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

GEOFFREY HINES

used a facility and means of interstate and foreign commerce, that is, the Internet, to knowingly persuade, induce, entice and coerce the minors listed below, each under the age of 18 years and known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacture and the attempted manufacture of child pornography, in violation of Title 18, United States Code, Section 2251(a), and attempted to do so.

Count	Date	Child
One	Between September 18 and November 6, 2015	Minor #1
Two	Between October 25 and October 26, 2015	Minor #2
Three	June 12, 2019	Minor #3
Four	Between July 2 and July 3, 2019	Minor #4
Five	December 22, 2019	Minor #5
Six	December 22, 2019	Minor #6
Seven	Between January 18 and January 19, 2020	Minor #7
Eight	January 20, 2020	Minor #8
Nine	January 26, 2020	Minor #9
Ten	February 11, 2020	Minor #10
Eleven	February 17, 2020	Minor #11
Twelve	February 17, 2020	Minor #12
Thirteen	February 17, 2020	Minor #13
Fourteen	February 17, 2020	Minor #14

All in violation of Title 18, United States Code, Section 2422(b).

COUNTS FIFTEEN THROUGH TWENTY-EIGHT**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

GEOFFREY HINES

employed, used, persuaded, induced, enticed, and coerced the minors listed below, each under the age of 18 years and known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by enticing and directing the minors to engage in sexually explicit conduct over live-stream which defendant HINES then surreptitiously recorded, and defendant HINES knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce:

Count	Date	Child
Fifteen	Between September 18 and November 6, 2015	Minor #1
Sixteen	Between October 25 and October 26, 2015	Minor #2
Seventeen	June 12, 2019	Minor #3
Eighteen	Between July 2 and July 3, 2019	Minor #4
Nineteen	December 22, 2019	Minor #5
Twenty	December 22, 2019	Minor #6
Twenty-One	Between January 18 and January 19, 2020	Minor #7
Twenty-Two	January 20, 2020	Minor #8
Twenty-Three	January 26, 2020	Minor #9
Twenty-Four	February 11, 2020	Minor #10

Twenty-Five	February 17, 2020	Minor #11
Twenty-Six	February 17, 2020	Minor #12
Twenty-Seven	February 17, 2020	Minor #13
Twenty-Eight	February 17, 2020	Minor #14

All in violation of Title 18, United States Code, Sections 2251(a), (e).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 19, 2020, in the Eastern District of Pennsylvania, defendant

GEOFFREY HINES

knowingly possessed matter, that is, a custom-built desktop computer, serial number FD-CA-DEF-R4-BL, containing one 1TB Seagate hard drive, a Toshiba external USB 500GB hard drive, serial number Y3NKSOL6SRE8, a Hewlett Packard laptop Model Pavillion computer, serial number CND290493, and a SanDisk Cruzer 16GB flash drive, which contained visual depictions that had been shipped and transported in interstate and foreign commerce and which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of a minor engaging in sexually explicit conduct. The minors depicted included prepubescent minors and minors who had not attained 12 years of age.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B), (b)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2422(b), 2251(a), and 2252(a)(4)(B), as set forth in this indictment, defendant

GEOFFREY HINES

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

- (1) One custom-built desktop computer, bearing serial number FD-CA-DEF-R4-BL, containing one 1TB Seagate hard drive;
- (2) One Toshiba external USB 500GB hard drive, bearing serial number Y3NKSOL6SRE8;
- (3) One Hewlett Packard laptop Model Pavillion computer, bearing serial number CND290493; and
- (4) One 16GB SanDisk Cruz flash drive.

All pursuant to Title 18, United States Code, Sections 2428 and 2253.



for 
WILLIAM M. McSWAIN
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

GEOFFREY HINES

INDICTMENT

Counts

18 U.S.C. § 2422(b) (use of an interstate commerce facility to entice a minor to engage in sexually explicit conduct – 14 counts)

18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child pornography – 14 counts)

18 U.S.C. § 2252(a)(4)(B), (b)(2) (possession of child pornography – 1 count)

Notice of forfeiture

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____
